# IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT DELAWARE

In re:

Chapter 11

RGN-GROUP HOLDINGS, LLC, a Delaware limited liability company, et al., 1

Case No. 20-*11961* (BLS) (Joint Administration Requested)

Debtors.

SECOND AMENDED<sup>2</sup> NOTICE OF (I) FILING OF BANKRUPTCY PETITIONS AND RELATED DOCUMENTS AND (II) AGENDA FOR TELEPHONIC AND VIDEO FIRST DAY HEARING ADJOURNED TO AUGUST 18, 2020, AT 9:00 A.M. (ET) BEFORE THE HONORABLE BRENDAN LINEHAN SHANNON AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE<sup>3</sup>

THIS HEARING WILL BE HELD TELEPHONICALLY VIA COURTCALL AND, IN CERTAIN CIRCUMSTANCES, BY VIDEO VIA ZOOM.

ALL PARTIES WISHING TO APPEAR MUST DO SO TELEPHONICALLY BY CONTACTING COURTCALL, LLC AT 866-582-6878. ONLY THOSE PARTIES THAT WILL BE ADDRESSING THE COURT SHOULD APPEAR BY VIDEO VIA ZOOM IN ADDITION TO THEIR COURTCALL REGISTRATION.

PLEASE NOTE THAT THE MICROPHONES ON THE ZOOM MEETING WILL BE MUTED AND THE ONLY AUDIO WILL BE THROUGH COURTCALL.

Topic: RGN Cases (Case No. 20-11894 (BLS))
Time: August 18, 2020, at 9:00 a.m. Eastern Time (US and Canada)

<sup>&</sup>lt;sup>1</sup> The Debtors in these chapter 11 cases, together with the last four digits of each Debtor's Federal Employer Identification Numbers ("<u>FEIN</u>"), where applicable are as follows: RGN-Group Holdings, LLC, RGN-National Business Centers, LLC (7723), H Work, LLC (4516), RGN-Columbus IV, LLC, RGN-Chapel Hill II, LLC, RGN-Chicago XVI, LLC, and RGN-Fort Lauderdale III, LLC. The aforementioned Debtors that do not include a FEIN are disregarded entities for tax purposes and do not have FEINs. The mailing address for the Debtors is 3000 Kellway Drive, Suite 140, Carrollton, Texas 75006 (Attn: James S. Feltman, Responsible Officer).

<sup>&</sup>lt;sup>2</sup> Amendments appear in bold and italics.

<sup>&</sup>lt;sup>3</sup> The documents referenced herein are available free of charge by request to Debtors' proposed counsel (Rokeysha Ramos, paralegal, at Rokeysha.Ramos@faegredrinker.com).

## Join ZoomGov Meeting:

https://debuscourts.zoomgov.com/j/1616620224

Meeting ID: 161 662 0224 Password: 506819

<u>Please note that, to appear telephonically via CourtCall, parties must make prior</u> arrangements with CourtCall by telephone at (866) 582-6878.

**PLEASE TAKE NOTICE** that the debtors and debtors in possession in the above-captioned cases (collectively, the "<u>Debtors</u>") filed the following voluntary petitions (collectively, the "<u>Petitions</u>") for relief under chapter 11 of title 11 of the United States Code, 11 U.S.C. §§ 101–1532 (the "<u>Bankruptcy Code</u>"), and, on August 11 *and August 17*, 2020, filed related pleadings with the Clerk of the United States Bankruptcy Court for the District of Delaware, which are set forth below. The Debtors continue to operate their business as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.

## **PETITIONS AND RELATED PLEADINGS:**

- 1. Voluntary Petitions
  - A. RGN-Columbus IV, LLC (Case No. 20-11894)
  - B. RGN-Chapel Hill II, LLC (Case No. 20-11910)
  - C. RGN-Chicago XVI, LLC (Case No. 20-11916)
  - D. RGN-Fort Lauderdale III, LLC (Case No. 20-11931)
  - E. RGN-Group Holdings, LLC (Case No. 20-11961)
  - F. RGN-National Business Centers, LLC (Case No. 20-11962)
  - G. H Work, LLC (Case No. 20-11963)
- 2. <u>Declaration of James S. Feltman in Support of Debtors' Chapter 11 Petitions and First</u> Day Relief [Docket No. 3]

**PLEASE TAKE FURTHER NOTICE** that a telephonic and video hearing with respect to the following first day pleadings (collectively, the "<u>First Day Pleadings</u>"), to the extent set forth below, is scheduled for **August 18, 2020, at 9:00 a.m.** (**ET**) (the "<u>First Day Hearing</u>") before the Honorable Brendan Linehan Shannon, United States Bankruptcy Judge for the District of Delaware.

#### FIRST DAY PLEADINGS GOING FORWARD:

3. <u>Debtor's Motion for Order Authorizing (I) Joint Administration of Chapter 11 Cases and (II) Filing of a Consolidated Creditor Matrix</u> [Docket No. 14]

## **Objections & Responses:**

A. Informal comments from the Office of the United States Trustee for the District of Delaware (the "<u>U.S. Trustee</u>")

## **Related Documents:**

- A. <u>Guarantor Debtors' Joinder to Certain First Day Motions Filed in Chapter 11</u> Cases [Docket No. 4]
- Status: The Debtors have conferred with the U.S. Trustee regarding the U.S. Trustee's informal comments to the motion and have resolved those comments by revising the proposed order. The Debtors have supplemented the relief requested by the motion as set forth in the joinder filed thereto. This matter will be going forward.
- 4. <u>Debtors' Motion for an Order Authorizing Debtors to Maintain Client Programs</u> [Docket No. 15]

# Objections & Responses:

A. Informal comments from the U.S. Trustee and the trustee appointed under section 1183(a) of the Bankruptcy Code (the "Subchapter V Trustee")

## **Related Documents:**

- A. Notice of Withdrawal of Debtors' Motion for an Order Authorizing Debtors to Maintain Customer Programs [Docket No. 31]
- <u>Status</u>: *The Debtors have withdrawn the motion.* As such, this matter will *no longer* be going forward.
- 5. <u>Debtor's Motion for Entry of Interim and Final Orders (I) Authorizing Payment to Utility Companies and (II) Granting Related Relief [Docket No. 16]</u>

# Objections & Responses:

A. Informal comments from the U.S. Trustee and the Subchapter V Trustee

## **Related Documents:**

- A. <u>Guarantor Debtors' Joinder to Certain First Day Motions Filed in Chapter 11</u>
  <u>Cases [Docket No. 4]</u>
- Status: The Debtors have conferred with the U.S. Trustee and the Subchapter V

  Trustee regarding their informal comments to the motion and resolved those

comments in principal. The Debtors have supplemented the relief requested by the motion as set forth in the joinder filed thereto. This matter will be going forward.

6. <u>Debtors' Motion for Entry of Interim and Final Orders (I) Authorizing the Payment of Certain Taxes and (II) Granting Related Relief [Docket No. 17]</u>

# Objections & Responses:

A. Informal comments from the U.S. Trustee and the Subchapter V Trustee

## Related Documents:

A. Notice of Withdrawal of Debtors' Motion for Entry of Interim and Final Orders
(I) Authorizing the Payment of Certain Taxes and (II) Granting Related Relief
[Docket No. 32]

<u>Status</u>: *The Debtors have withdrawn the motion.* As such, this matter will *no longer* be going forward.

7. Application of the Debtors for Entry of an Order Appointing Epiq Corporate
Restructuring, LLC as Claims and Noticing Agent Effective as of the Guarantor
Debtors' Petition Date [Docket No. 5]

## **Objections & Responses:**

A. Informal comments from the U.S. Trustee and the Subchapter V Trustee

Status: The Debtors have received informal comments from the U.S. Trustee but were not able to address them prior to filing the application. The Debtors will confer with the U.S. Trustee regarding his comments and work to consensually resolve them prior to the hearing. This matter is going forward

8. <u>Debtors' Motion for an Order Authorizing RGN-National Business Centers, LLC to</u> Serve as Foreign Representative on Behalf of the Debtors' Estates [Docket No. 6]

Status: This matter is going forward

9. <u>Debtors' Motion for Interim and Final Orders Establishing Notification Procedures for Termination Actions by Landlords</u> [Docket No. 7]

Status: This matter is going forward

**PLEASE TAKE FURTHER NOTICE** that parties who wish to participate in the First Day Hearing may do so by contacting CourtCall at 866-582-6878 to register their appearance for audio **AND**, in certain circumstances, by joining through Zoom at

https://debuscourts.zoomgov.com/j/1616620224 Meeting ID: 161 662 0224 & Password: 506819) for video. Only those parties that will be addressing the Court should appear by video via Zoom in addition to their CourtCall registration.

**PLEASE TAKE FURTHER NOTICE** that objections, if any, to the First Day Pleadings may be made at the First Day Hearing.

Dated: Wilmington, Delaware August 17, 2020

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-and-

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Proposed Counsel to the Debtors and Debtors in Possession